ORIGINAL

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EX PARTE OR LATE FILED

July 28, 1999

EX PARTE PRESENTATION

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

RE: D*eployment of Wireline Services Offering Advanced Services Capability; CC Docket No. 98-147*

Dear Ms. Salas:

On July 28, 1999 Alan Samson, Kreig Cline, Mark Russell and the undersigned representing SBC met with Stagg Newman, Jerry Stanshine, and Douglas Sickel representing the Office of Engineering and Technology and Margaret Egler, Staci Pies, Vicent Paladini, and Michael Jacobs representing the Policy and Program Division of the Common Carrier Bureau to discuss issues in the above referenced docket.

The SBC representatives presented an overview of SBC's comments filed in this proceeding. Attached to this Ex Parte letter are the documents used to facilitate this discussion.

Please include this letter and attachments in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

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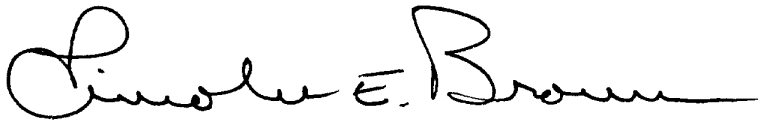
Respectfully submitted,



Enclosures

Cc: Jerry Stanshine
Stagg Newman
Margaret Egler
Staci Pies
Vincent Paladini
Douglas Sickel
Michael Jacobs

SBC-FCC Meeting:

Spectrum Management & Line Sharing

Spectrum Management: *The Need*

FCC Comments on Spectrum Management Rules

- Necessary to foster competition and ensure quality & reliability. (para 63)
- Enable multiple technologies to coexist within binder groups. (para 61)
- Reduce problems as penetration increases. (footnote 185)
- ILECs should not have unilateral control. (para 63)

Realities of the Network

- Advanced services are interfering technologies.
- Rapidly increasing demand.
- Proper deployment can reduce or eliminate service affecting interference.
- Multiple carriers using outside plant network.

Spectrum Management: *The Tools*

National Standards

- ANSI T1E1.4.
- FCC endorsement of standards.
- Provides equal platform for determining spectrum guidelines.
- Compromise between performance and flexibility

Power Spectral Density (PSD) Masks

- Developed to permit divergent technologies to coexist.
- Required use for maximum benefit.
- Other technologies could be accommodated.

Spectrum Management: *The Processes*

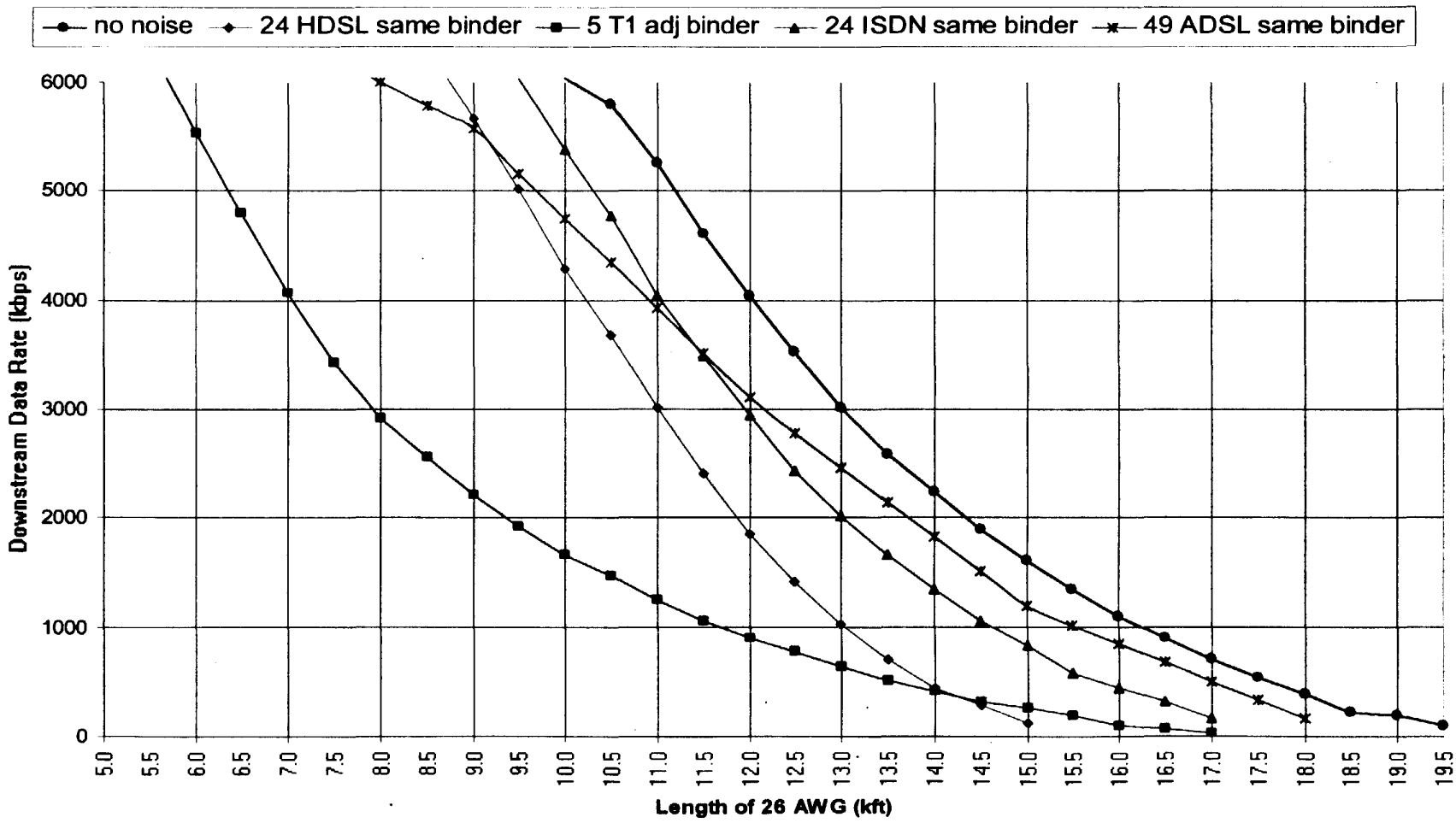
PSD Class Plays Key Role

- Loop qualification.
- Require PSD Class identification with loop order.
  - Necessary to meet disclosure obligations concerning the number and *type* of technology deployed. (para 73)
  - Necessary to maximize number and *type* of advanced services deployed as required. (para 76)
- Critical in trouble isolation and repair.

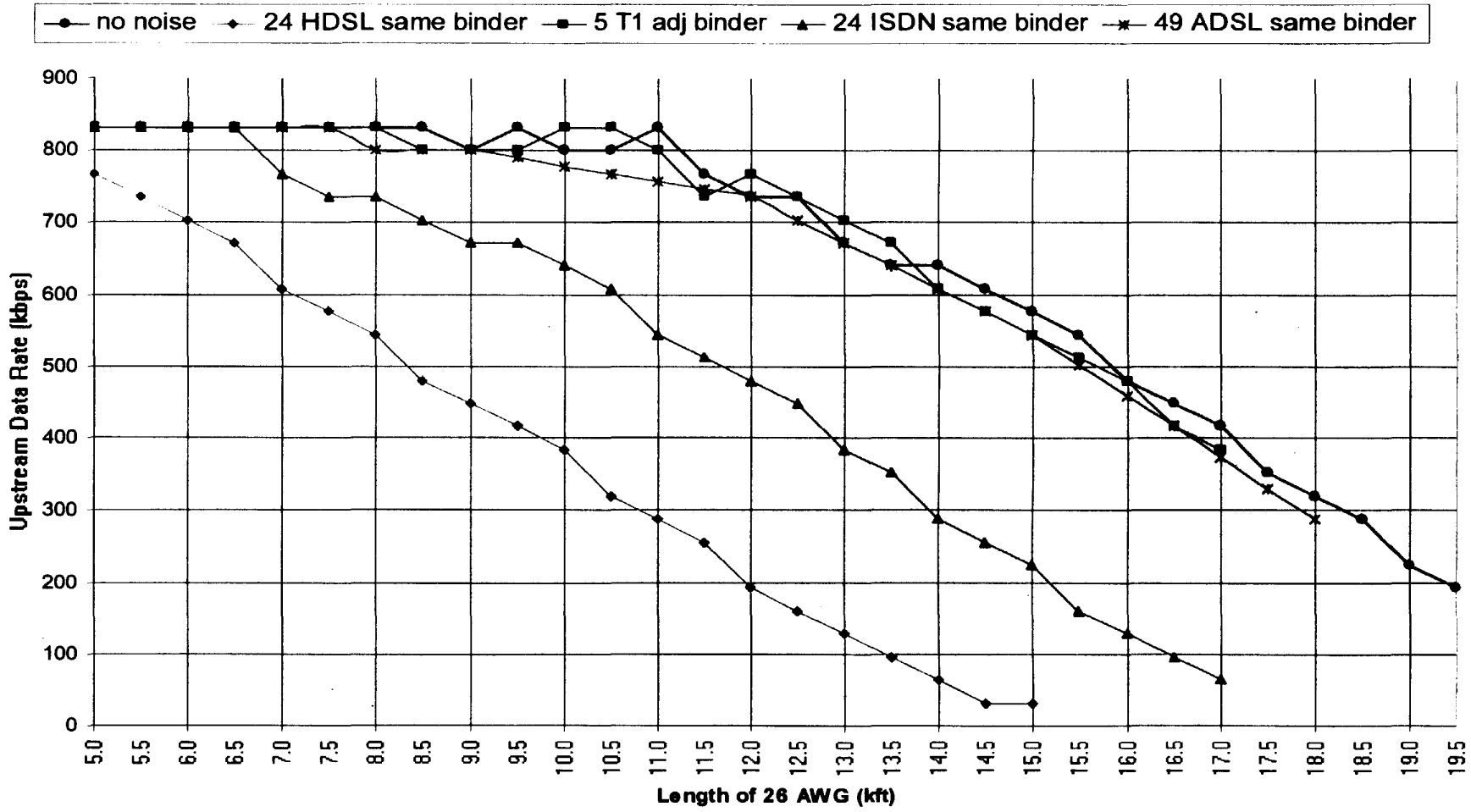
Provisioning & Binder Group Management

- Of limited value without the required use of PSDs.
- Flexibility: Selective Feeder Separation (SFS)
- Equitable: Treats all requesting carriers equally - no downside

Spectrum Management: *Illustration of Performance Variability*



Spectrum Management: *Illustration of Advantage of SFS*



Spectrum Management: *Other Issues*

AMI T1

- Role of new services versus embedded services.
- Alternatives not always available or economically feasible.
- T1 migrations can be customer affecting.
- Pacific Bell estimates $243M in capital and $63M in expense to migrate all AMI T1s.
- Interference can be largely managed during customer churn towards advanced services.

Spectrum Unbundling/Line Sharing: *Benefits Overstated*

Inconsistent with the Current Direction of Technology

- Moving to a Packet Network.

Will not be Immediately Available

- Equipment and network standards would need to be developed.
- Vendors will have to manufacture equipment to standards.
- ILECs/CLECs will have need to modify network and support systems.

Infeasible in Some Situations

- Loop reach limitation.
- Digital Loop Carrier Limitation.
- Technology used by CLECs is not compatible.

Costs May Exceed Benefits

- OSS systems.
- Equipment.
- Customer impact(s).

SBC Recommended Guidelines:
If Line Sharing/Spectrum Unbundling Ordered

Divide Spectrum into Data and Voice.

- Multiple divisions complicate OSS's, vendor development, repair time, etc. even further.
- Limit two carriers per line.
- Voice - 0-4 KHz, Buffer Zone - 4 - 25 KHz, Data - 25Khz+.

Each pair serves one address.

VoIP is considered to be data.

- Derived voice will most likely require locally powered terminal device.

Analog Voice Services have precedence over Data Services if the loop can only support voice or data.

Data providers who provide services that interfere with the voice spectrum have to purchase an UNE.